

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs,

V.

THE PALESTINIAN AUTHORITY, et al.,

Defendants.

C.A. No. 00-105L

**MOTION FOR ENTRY OF A PROTECTIVE ORDER REGARDING “PLAINTIFFS’
NOTICE OF DEPOSITION TO THE PALESTINIAN AUTHORITY PURSUANT TO
RULES 30(b)(6) AND 69”**

Defendant The Palestinian Authority (“PA”), through counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure (“Rule”) 26(c) to enter a protective order quashing “Plaintiffs’ Notice of Deposition to the Palestinian Authority pursuant to Rules 30(b)(6) and 69.”

For the reasons set forth in the accompanying Memorandum, which establish the requisite good cause, the Palestinian Authority requests that the Court prohibit Plaintiffs from taking the Rule 30(b)(6) deposition.

FEDERAL RULE OF CIVIL PROCEDURE 26(c)(1) CERTIFICATION

Counsel for Defendant hereby certifies that, as required by Fed. R. Civ. P. 26(c)(1), they have conferred with all parties or non-parties who may be affected by the relief sought in the Motion in a good faith effort to resolve the issues raised in the Motion and have been unable to do so.

Respectfully submitted,

Dated: November 29, 2010

/s/ Mark J. Rochon
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 29th day of November 2010, a true and genuine copy of the foregoing was filed by ECF, which will automatically send notification and a copy of such filing to counsel of record for all parties.

/s/ Mark J. Rochon